



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 26, 2023

By ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Application Granted

Valerie Figueredo, U.S.M.J.

DATED: 10-27-2023

The conference scheduled for November 9, 2023 is adjourned and will be rescheduled once the Government has submitted its answer or has otherwise responded to the complaint. The Clerk of Court is directed to terminate the motion at ECF No. 15.

Re: *Marcia Edwards v. Alejandro Mayorkas*, No. 23 Civ. 6942 (VF)

Dear Judge Figueredo:

This Office represents the United States of America (the “Government”) in the above-referenced action brought pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* We write on behalf of the parties to respectfully request an adjournment of the deadline to submit a Report of Rule 23(f) Meeting and Proposed Case Management Plan, which is currently due on November 2, 2023, as well as the initial case management conference which is currently scheduled to take place on November 9, 2023. *See* ECF No. 14.

The reason for this request is that the parties believe it would be most efficient to allow the Government to answer or otherwise respond to the complaint before commencing discovery. The Government was served with the complaint on September 27, 2023. Accordingly, under Federal Rule of Civil Procedure 12(a)(2), the Government has until November 27, 2023 to respond.

The parties thus request that the initial case management conference be adjourned to a date the week of December 11, 2023 or a later date that is convenient for the Court, with the Report of Rule 23(f) Meeting and Proposed Case Management Plan to be submitted one week prior to the initial case management conference. There have been no prior requests for an adjournment of the conference, and all parties consent to the adjournment.

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Danielle J. Marryshow
DANIELLE J. MARRYSHOW
Assistant United States Attorney
COURTNEY E. MORAN
Special Assistant United States Attorney

86 Chambers Street, Third Floor
New York, NY 10007
Tel: (212) 637-2689/2800
danielle.marryshow@usdoj.gov
courtney.moran@usdoj.gov

cc: Counsel for Plaintiff (By ECF)